

**THE ROSEN LAW FIRM, P.A.**

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[Proposed] Lead Counsel for the Class

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GANG KOU, INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiff,

vs.

MEDIS TECHNOLOGIES LTD., ROBERT  
K. LIFTON, and ANDREW UDIS,

Defendants.

Case No.: 07CV3230 (PAC)

**BY ECF**

**CLASS ACTION**

**NOTICE OF MOTION OF THE MEDIS  
INVESTOR GROUP TO: (1) APPOINT  
LEAD PLAINTIFFS; AND (2)  
APPROVE LEAD PLAINTIFFS'  
SELECTION OF COUNSEL**

**PLEASE TAKE NOTICE** that pursuant to Section 21 D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiffs Chun Yu Wong, John Sellars, and Royce Oelschlager (collectively "Movants" or "Medis Investor Group") hereby move this Court, the Honorable Paul A. Crotty, United States District Judge, for an order:

(a) appointing the Medis Investor Group and each of its members to serve as Lead Plaintiffs in this action; and

(b) approving Medis Investor Group's selection of The Rosen Law Firm P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (1) the Declaration of Phillip Kim dated June 22, 2007 (with exhibits); (2) Memorandum of Law dated June 22, 2007; and (3) a [Proposed] Order granting Movants' Motion to appointing Lead Plaintiffs, and approving Lead Plaintiffs' selection of Counsel.

Respectfully submitted,

Dated: June 22, 2007

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

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[Proposed] Lead Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on this on the 22<sup>nd</sup> day of June, 2007, a true and correct copy of the foregoing NOTICE OF MOTION OF THE MEDIS INVESTOR GROUP TO: (1) APPOINT LEAD PLAINTIFFS; AND (2) APPROVE LEAD PLAINTIFFS' SELECTION OF COUNSEL was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim